

Environment, Social and Governance (ESG) Policy and Framework

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Environment, Social and Governance (ESG) Policy and Framework

ESG Policy and Framework

ESG stands for Environmental stewardship, social responsibility, and purposeful Governance. By the virtue of its nature, the life insurance business lies at the cusp of ESG.

India's journey to deeper insurance penetration will be powered by its favorable demographic dividend. There is a significant growth in the market for sustainable products and services and consumers are becoming more educated about the environmental and social impacts of the products and services they consume.

Building an ESG mindset will enable IndiaFirst to become sustainable, while continuing to grow at a healthy rate. ESG needs to be built into minds of every member of organization, from a board member and management to the last employee.

All initiatives of ESG should be directed towards three pillars – People, Planet and Process & Governance

1. **People:** The first pillar of sustainability is about people, within the organization and outside.
 - **Employees:** It is about building a “Great Place to Work” where people achieve their full potential.
 - **Customers:** It is about securing Lives and creating value for customers. The Company leverages the capabilities of big data to better understand individual customer preferences and lifestyle choices. While data sets can be collected from third parties, new-age tech will be used to collate real-time lifecycle data. The company may use this data to tailor products, Curate premium plans and underwriting schedules, send early warning health signals and get better customer insights. This will drive recurring premiums across lives of individuals.
 - **Society and Communities:** It is about fostering inclusive growth in society, especially in communities touched by the business and about making sustainability personal for each person associated with the Company.
2. **Planet:** The second pillar of sustainability is about planet. It is impossible to be a sustainable business in an unsustainable world. The planet can only replenish about 60% of the natural resources we use during the year. Rapid deterioration of natural assets puts the availability of the very resources that power our growth at serious risk. The Company is committed to being a carbon-neutral by 2050 and will take decisive steps towards the same on carbon, water, and waste management. The Company has adopted digitization initiatives since its inception. Digitization helps reduce energy consumption, environment impact and greenhouse gas emissions. This also helps reduce costs, reduce operating risk and make the business more resilient. These actions are as relevant at supplier locations as they are within the company, and therefore, sustainability actions are key to ensuring sustained profits even in difficult times.

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- 3. Process and Governance:** The Company's philosophy that business priorities co-exist with strong governance and internal controls is supported with Company's four values applicable to all stakeholders to Do More, Think New, Be Honest and Be Helpful. Company has laid out Code of Conduct which lays down responsibility and expectations for all our employees, Directors and Board members to follow it and abide by high ethical standards to ensure integrity, transparency and accountability in dealing with all our stakeholders.

Please refer Annexure for implementation and strategy of ESG policy and framework.

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Annexure: ESG Policy and Framework Implementation and Strategy

ESG Policy statement

IndiaFirst Life has a goal to make life insurance available to every Indian household thereby to create a positive impact on the lives of every individual, economy, society, and the environment. Life insurance business itself is social in nature, and beyond business, the Company is committed to drive inclusive growth and social advancement. This is done by providing adequate and affordable financial protection and promoting savings to achieve financial goals as per the individual's life stage for all sections of the society. The Company offers need based products to varied customer segments under the categories of Protection, Assured Savings, Wealth, Pension, Health, and Group Funds that help customers prepare for the certainties of life. Our Customer First philosophy with which we treat our customers, our "Circle of Trust" proposition acts as a beacon of how we conduct ourselves: every behaviour is guided by an intent to earn trust.

Our vision

Become a life insurance and pension business leader in providing significant value for all stakeholders through true customer delight. We will ensure sustainability by doing what is right, through the adoption of sustainable business practices, employee policies and technologies.

Our values

The four values of IndiaFirst Life's business jointly, severally, and equally applicable to all stakeholders are: Do More, Think New, Be Honest and Be Helpful. These are simple but profound values constituting a culture of go-getting attitude, innovation, transparency, fairness, good conduct, governance and service orientation to the society at large.

Our business

With a passion for serving customers, we believe the certainties far outweigh the uncertain and we'd like you to prepare for those moments.

At IndiaFirst Life, we come to work every day with the goal of making insurance easily available to every Indian household. We've come a long way from that momentous day in November 2009, when as the 22nd private sector entrant in the Life Insurance Industry, we sold our first policy.

We've had Bank of Baroda, Andhra Bank (now, Union Bank of India) and Legal & General as our founding partners. After journeying with us through our years of growth, Legal & General sold its stake in February 2019 to Carmel Point Investments India Private Limited, a body incorporated under the laws of Mauritius and owned by private equity funds managed by Warburg Pincus LLC, New York, United States. This is the first deal wherein a private equity fund has taken an interest in a life insurance company. In April 2020, Andhra Bank was amalgamated into The Union Bank of India.

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Our shareholding pattern as of today stands at: Bank of Baroda – 65%, Union Bank of India – 9% and Carmel Point Investments India Private Limited – 26%.

We offer a diversified suite of products catering to varied customer segments, leveraging multiple distribution capabilities and augmenting various investment options. In all, propositions under the categories of Protection, Assured Savings, Wealth, Pension, Health and Group Funds for Employee Liabilities form a complete suite of offerings that help our customers prepare for the certainties of life. Our products are easy to understand and competitively priced with risk management being our core strength.

Our ESG philosophy

IndiaFirst Life helps people get the most out of life. The Company makes life insurance affordable and accessible to all, protects people's wealth and grow their assets and empower customers to save for their goals. The Company contributes towards fulfilling the country's vision of making India a fully insured society through the Government's flagship insurance scheme PMJJBY and through its innovative micro insurance products.

Key Focus Areas for Sustainability

The Company is committed to the principles elucidated in the National Guidelines for Responsible Business Conduct as prescribed by the Ministry of Corporate Affairs. Accordingly, the Company shall:

- Conduct and govern itself with integrity in a manner that is ethical, transparent, and accountable.
- Offer products and services in a manner that is sustainable and safe.
- Respect and promote the well-being of all its employees and those in its value chains.
- Respect the interests of and be responsive towards all stakeholders.
- Respect and promote human rights.
- Respect, protect and make efforts to restore the environment.
- Engage with the public and/or any regulatory body in a manner that is responsible and transparent.
- Promote inclusive growth and equitable development.
- Engage with and provide value to customers in a responsible manner.

The Risk Committee of the Board of Directors will have oversight on ESG initiatives of the Company. In addition to areas relating to risk management that are directly within the remit of the Risk Committee, the Committee will review the Company's action plan on various aspects of ESG, external reporting and stakeholder feedback.

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Areas that are within the purview of other Board Committees shall continue to be overseen by the respective Committees (for example, Corporate Social Responsibility Committee, Protection of Policyholders Committee etc). Any updates relevant to ESG in these areas will be presented to the Risk Committee.

Identification and implementation of ESG related initiatives shall be undertaken by the ESG Forum comprising representatives of various functions within the Company, which shall be chaired by the Chief Risk Officer. It is pertinent to mention here that ESG is an evolving space, and we strive to remain at the top of all developments given our commitment to industry leading practices.

I. Business Ethics and Conduct

i. Corporate Governance

Company's Corporate Governance framework is in alignment with the provisions of Companies Act 2013, SEBI (Listing Obligations and Disclosure Requirements) and IRDAI Corporate Governance Guidelines.

The Board and its Committees have an oversight over functioning of the Company. These include the following:

Committees of the Board	Sub-Committee reporting to Committee of the Board
Investment Committee	Sub Investment committee
Corporate Social Responsibility (CSR) Committee	Sub CSR
Nomination and Remuneration Committee	Sub-NRC
Protection of Policyholders Committee	-
With Profits Committee	-
Audit Committee	
Risk Management Committee	Asset Liability Committee
	Information Security Committee
	Products Management Committee
	Outsourcing Committee
	Controls Management Committee
	Vigilance & Ethics Committee

Additionally, there are various Internal Review Forums which provides necessary governance across functions.

Corporate Governance framework encompasses regulatory and legal requirements. It includes the following key policies, codes and procedures implemented through its Board Committees, actively monitored by compliance, risk oversight, and audit supervision.

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- Whistle-Blower Policy
- Anti-Fraud policy
- Anti-money laundering policy
- Information Security policy
- Business Continuity policy
- Grievance Redressal policy
- Prevention of sexual harassment policy
- Corporate Social Responsibility
- Risk management Framework and policy
- Stewardship policy
- Investment policy
- Related Party Transactions policy
- Employee code of conduct

The Board approved policies provide strategic direction to the Management and a comprehensive set of Standard operating procedures help with implementation of the policies.

The first line of defence executes its role through the SOP's, the second line of defence is done through a set of Risk Experts who implement a Risk and Control Self-Assessment (RCSA) framework. This is fortified by the Compliance and Legal teams. The third line of defence (Internal Audit) tests the design and operating effectiveness of the internal controls.

ii. **Cyber Security and data privacy**

Our business model requires collection and handling of sensitive personal data. With evolving fintech business models and associated risks around information and cyber security, this key issue assumes significant importance.

The Company is committed to operate in a consistent, reliable, resilient & secure technology environment and protect the data entrusted to Company by all stakeholders.

The Company has Information and Cyber Security policy which aims to ensure that reasonable security controls are in place to safeguard the confidentiality, integrity and availability of information thereby complying with applicable legislative, regulatory, and contractual requirements and limiting the likelihood and impact of any information security breach.

The Information and Cyber Security governance encompasses the management oversight at various levels through Committee's. The Information Security (IS) Committee is sub-committee of the Risk Management Committee of the board. The IS Committee reviews the implementation of Information Security policy and meets

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periodically to discuss the cyber risks faced by the Company and the progress of Information Security program.

iii. Risk management

We provide risk cover and security to our customers. Risk management within our organisation is therefore an integral part of our business and effective management of risk is essential to achieve our strategic and business objectives.

Risk Management Committee of the Board is responsible for overseeing our risk management program and for ensuring that significant risks are monitored and reported to the Board of Directors in a timely manner. We have adopted a standardised four-stage risk management process, namely, risk identification and assessment, risk measurement, risk monitoring and risk control.

A comprehensive Risk management framework and policy is developed that specifies the process for identification, measurement and analysis of risk exposures and monitors risk management strategies. Our risk management framework and policy are harmonized with our other operational policies, including those relating to compliance, outsourcing, fraud management risks and business continuity management. Risk management activities consider insurance, business, credit and investment, operational risks which includes strategic risk, market risk, credit risk, fraud risk, information security risk, compliance risk and business continuity management. The key focus areas of our risk management framework include (i) strategic risk assessment; (ii) governance; (iii) risk universe; and (iv) risk awareness.

We identify risk exposures through a variety of techniques and processes, including:

- Stress testing of our current financial condition. We identify risk by monitoring indicators such as our Company's Embedded Value or solvency or liquidity positions.
- Sensitivity analysis of profit margins to market and insurance risks during product development process. We assess risks arising out of a new product or modifications of an existing product prior to product launch.
- Sensitivity analysis of projected solvency and profit as part of the annual business planning process; and
- Risk and Control Self-Assessment ("RCSA") to identify and assess operational risks in terms of their likelihood and impact by each business department. RCSA is conducted with due cognizance to any historical loss events or negative audit findings.

We measure our risk exposure through the following indicators:

- Risk to EV: We run various sensitivities on our EV appropriate to the external and operating environment and our stage of development as an indicator of our risk exposure for market, credit and insurance risks.

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- Risk to EV growth: In addition to the risk to the current Embedded Value, we also consider risks that may impede future Embedded Value growth such as insufficient new business profit growth as well as over-run in acquisition or renewal expenses caused by adverse deviation of actual unit costs from planned unit costs.
- Risk to statutory position: We assess the impact of market risk on our statutory position and assess the quality of our AUM by performing a resilience test periodically by calculating changes in solvency under extreme economic scenarios,
- Operational and fraud losses: We identify the extent of deviation from our risk tolerance limit by measuring our operational and fraud losses as a proportion of profit for the same period.
- Liquidity ratio: We assess our liquidity position by tracking the ratio of highly liquid assets to near term liabilities.

For risk awareness, we conduct regular training sessions, workshops, and conferences, and engage effectively with our employees to develop awareness and sensitize them to risk management issues across our business and operations.

iv. Business Continuity planning

The Company has a defined Business Continuity policy. Implementation of the Policy ensures continuity of critical operations and provide services and support to all its customers and stakeholders within a reasonable timeframe after any interruptions.

Besides it also safeguards the brand image of the Company during crisis through development of effective communication strategies to be used, cares for the safety of all its stakeholders and ensures compliance with legal, statutory, and regulatory requirements.

v. Customer centricity

Company designs the products considering its philosophy of “Customer First”. The Company acknowledges the need of inclusion of bottom of the pyramid and designs products frequently to address the unique needs of this segment.

The Company believes in innovation and has invested in easy to understand and simple products such as Insurance Khata. The sales process is simple and instant which has helped promote the product to vulnerable and marginalized groups.

Through the Bancassurance distribution and tie-ups with five Regional Rural Banks, the Company is reaching out to a larger rural customer base.

The sales practices are adopted taking into consideration the best interests of the customers as follows:

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- The Company provides all material information in respect of a proposed cover to the prospect to enable the prospect to decide on the best cover that would be in his or her interest and that would need the customer's financial needs.
- Where the prospect depends upon the advice of the Company or his agent or an insurance intermediary, such a person must advise the prospect dispassionately.
- Where for any reason, the proposal and other connected papers are not filled in by the prospect, the Company or the distribution channel shall explain the contents of the form, and a certificate shall be incorporated at the end of the proposal form from the prospect that the contents of the proposal form and connected documents have been fully explained to him /her and he /she has fully understood the significance of the proposed contract.
- The Company also ensures that the consent of the prospect is obtained before the solicitation and certifies that sufficient prudence has taken at the time of contacting the prospect to ensure to provide the complete clarity about the Company, products, and its distribution channels / mode.
- The Company also ensures that canvassing so made, does not involve compulsion, inconvenience, undue influence, or any kind of nuisance to the prospect.

The following customer service measures are taken at point of service for

- Pre-Issuance Verification Call (PIVC): Based on the customers profile, pre issuance verification call is made to specific channels and segments of the customers to ensure the plan features and benefits are well understood by them before issuance.
- Welcome Call: Based on the Product opted for & sourcing channel, post issuance of the policy, a welcome call is initiated to explain the key feature of the policy and confirm the policy document is received and read by the customer.
- Policy Document: All the key feature and benefits of the policy is mentioned in a simple and transparent manner in the policy document issued to the customer.
- Claims settlement: Our Claims philosophy ensures speedy and efficient service to genuine claimants by providing wider access and awareness for claim intimation across various touch points i.e., Bank branches, website, WhatsApp, and call center. The ease of operations of the digital touchpoints offers greater convenience to claimants at their time of distress. Further, the Company handles every claim with a high degree of sensitivity and ensures complete handholding of the claimant at every step of the settlement process.

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II. Responsible Investments

IndiaFirst Life Insurance has a fiduciary responsibility towards policyholders and strives to achieve the best practices in investment and governance practices. We would like to ensure that the businesses that we invest in, operate in a responsible manner.

Most of our funds' performance is compared with well recognised external benchmarks. These benchmarks do not have any specific inclusion of ESG considerations. Given our responsibility to deliver fund return above benchmark, we need to maintain a balance between our fiduciary responsibility to our policyholders and ESG risks considerations as part of our investment process.

We incorporate responsible investing in our investment processes by adhering to the following:

- Stewardship Policy
 - Monitoring Investee companies on ESG framework
 - Augmenting ESG Training and Capacity
 - Broadening Portfolio Inclusions
 - Launch of ESG Fund
 - Exposure Limit Restrictions
 - Review of Responsible Investments Policy
- i. **Stewardship Policy:** - We follow active ownership in our investee companies and have implemented a Stewardship policy which is publicly disclosed. (<https://www.indiafirstlife.com/stewardship-policy>)
- We actively monitor the investee companies on various parameters with a view to protect policyholder's interest. Some of the parameters include but not limited to business strategy, performance, risk, capital structure, culture, leadership effectiveness, remuneration, succession planning, corporate governance, reporting, etc.
 - We regularly interact with the management of companies to remain updated with company's performance and developments. Any observation(s) of grave nature which may potentially jeopardise the interest of policyholders are taken seriously for discussion with higher authorities of investee companies as well as internally. Any interventionist action will be taken on case-by-case basis entirely on its own merits and ensuring it is in the best interest of the policyholders.
 - Any collaborative activities with other investors undertaken by IndiaFirst Life Insurance would always be in the best interests of its policyholders' subject to statutory regulations governing these activities.

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- ii. **Monitoring Investee companies on ESG framework:** - The investments team will take steps to evaluate the investee companies on ESG framework. The aim is to monitor the progress of ESG compliance of the investee companies.
- iii. **Augmenting ESG Training and Capacity:** Augment knowledge and capacity among our investment analysts through dedicated training initiatives.
- iv. **Broadening Portfolio Inclusions:** Broaden portfolio inclusions by specific considerations of green bonds, sustainability bonds and equity/debt exposure to renewable & alternative energy. However, the merits of the investment exposure would be considered taking the financial performance and the corporate governance practices of the company into account.
- v. **ESG Fund:** The company has IndiaFirst Sustainable Equity Fund with a focus on investing in the companies following the Environment, Social & Governance (ESG) theme. ESG factors and Responsible Investing (“RI”) form an integral part of the Company’s investment process for the Scheme.

About exclusions from the IndiaFirst Sustainable Equity Fund, companies engaged in the business of tobacco, alcohol, controversial weapons, and gambling operations shall be excluded. Controversial Weapons include chemical weapons, biological weapons, anti-personnel mines and cluster bombs. The above is aligned to the exclusion policy followed by Nifty 100 ESG Index.

Review of Responsible Investments Policy: IndiaFirst Life will review the principles/practices in incorporating the Responsibility Investment (RI) on an annual basis.

III. Holistic Social Development

i. Our Employees

- IndiaFirst life encourages and promotes the culture of creating a collaborative workspace where employees are considerate of each other’s integrity and dignity, their respect, their right to equality and right to opportunity in workplace.
- IndiaFirst Life is an equal opportunity employer; it is committed to create an ethos of acceptance and inclusivity at the workplace such that individuals regardless of their sexual orientation, sexual preferences, individuals belonging to LGBTQI community, choosing to not be in any of the socially constructed communities and adopting a fluid/non-binary approach.
- Company believes in Equal Pay Parity and providing a meritocratic culture which encourages meeting the aspirations of everyone. Company participates in the Annual Compensation exercise as a part of the Rewards strategy. One of the

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important dimensions of the compensation exercise is also to make sure there is no disparity in terms of rewards based on gender at IndiaFirst Life for a similar level of exercise and performance.

- Company has launched the FlexiFirst Hybrid Working Policy which provides work life balance to employees through a hybrid working arrangement. Through the hotdesking app, employees can book their desks in office in advance thereby helping in efficient management of office space.
- All critical employee life cycle stages right from joining to performance management to learning and development as well as other aspects are digitised. This is also a step towards saving the environment.
- The Company provides capability development opportunities to employees for their all-round development and thus impact performance at work. There are three key pillars of our overall Talent Management and Capability Development Strategy namely Leadership Development, Differential Development and Capability Development. For capability development, the Company believes in the '70-20-10' philosophy of learning where 70% of the learning happens on the job, 20% through feedback, coaching and mentoring and 10% through training, executive programmes, and online learning.
- In an endeavour to provide a safe work environment, the Company has a comprehensive suite of benefits, including life insurance and Mediclaim cover to employees and their dependents. Also has designed special policies to meet the life-stage needs such as childcare leave, paternity and maternity leave, sabbatical options etc.
- For psychological safety, Company provides EAP (Employee Assistance Programme) which is a confidential 24/7 service which equips and provides support to employees when they meet challenges in life. The service is available both on telephone and face to face. It offers a range of reliable self-help resources as well as personalized help through counselling from professional counsellors. Up to 3 dependent family members, per employee can access the services and all the costs related to EAP are borne by the company and is free at the hands of the employee.
- IndiaFirst consciously invests in programs to advocate the philosophy of an open culture where employees can cross barriers without any inhibitions while also maintaining the communication hierarchy. Practices like regular townhall, webchats, skip level discussions, employee feedback surveys ensure that the organization knows and understand the employee pulse. This also helps in taking informed decisions and initiating measures that increase employee morale. It also helps employee collaboration and involvement to the highest level.

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- Company has formulated a policy against sexual harassment at workplace and is committed to creating a safe and conducive work environment that enables all to work without fear of prejudice, gender bias and sexual harassment, where employer and employees respect each other's integrity and dignity, their privacy, their right to equality and right to opportunity in the workplace. It has constituted an Internal Complaints and an Appeals Committee for receiving and redressing complaints related to sexual harassment at Workplace from Complainants.

ii. Society

We endeavour to protect the interests of all our stakeholders and contribute to society at large, by making a measurable and positive difference through the four causes we support.

Our society initiatives include the following:

- Education: , Participating in financial literacy drives across various sections of the society through the financial inclusion and Insurance Awareness programs.
- Volunteering: Promoting employee volunteering through time and skills in the selected focus areas and projects

Women empowerment: Promoting gender equality and empowering women,

- Any other project or program that falls under the purview of Schedule VII of Section 135 of the Companies Act, 2013, as amended from time to time.

Geographies and target communities: Our focus will be Geographies which we operate in, and target communities will be socially and economically underprivileged communities and individuals.

Implementing mechanism: We will implement our projects only through Registered agencies / entities as specified under the provisions of the Companies Act, 2013 and the Rules framed thereunder, as amended from time to time.

Annual Action Plan: The Company shall formulate and recommend the Annual Plan to the CSR Committee who in turn will recommend the Plan to the Board of Directors for approval. The Annual Plan shall cover the details of the CSR projects to be undertaken, manner of execution, modalities of utilization of funds and implementation schedules, monitoring and reporting mechanism and the need and impact assessment of the CSR projects, if any.

The impact assessment stories in conjunction with our CSR spends will be reported to the CSR Committee, Board and will be published on the Company's website.

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iii. Insurance Awareness Programs for society at large

The Company has an annual action plan for initiating insurance literacy and awareness campaigns across the Country. The objective of creating insurance awareness is as follows:

1. To impart knowledge of insurance to every person, especially the people who live in the rural area.
2. To ensure that efforts are taken to spread insurance awareness.
3. To take steps to help people understand the merits of availing of insurance.
4. To identify states/ districts for enhancing insurance awareness.

Insurance Awareness programs are conducted on an ongoing basis through press releases, digital media, and events.

IV. Stakeholder engagement and accountability

The Company engages with key stakeholders as follows:

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Stakeholder	Mode of engagement	Key expectations	How is value delivered
Customer	<ul style="list-style-type: none"> Corporate website Bank branch and FPC assistance Service camps Self-serve touch points like BOTs, apps, customer portal etc. Engagement for servicing requests, claim processing and settlement Customer satisfaction survey 	<ul style="list-style-type: none"> Need-based and innovative products Data security Simplified service and best-in-class customer experience Easy and quick claim settlement 	<ul style="list-style-type: none"> Create innovative and customer-centric products. Nudge customers to self-service avenues Increase operational efficiency through automation, data insights and security measures Augmentation of touchpoints, both physical and virtual to improve availability and reach
Shareholders	<ul style="list-style-type: none"> Quarterly Board meetings Annual General Meeting (AGM) Annual report, public Disclosures Media interactions 	<ul style="list-style-type: none"> Value creation Risk management Adoption of sustainable business practices 	<ul style="list-style-type: none"> Consistent and predictable delivery of growth along with profitability Differentiated business model with multiple sources of value generation

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<p>Employees</p>	<ul style="list-style-type: none"> • Feedback, recognition and talent management • Learning & development initiatives • Employee engagement, wellness and safety initiatives • CEO Town hall, Achievers First events and Foundation Day events 	<ul style="list-style-type: none"> • Career development opportunities • Diversity, equity and inclusion • Fair compensation • Regular training • Employee engagement Wellness & safety 	<ul style="list-style-type: none"> • Fair, transparent & timely performance appraisal process • Increased employee engagement, mobile-based learning program. • Adoption of holistic approach towards wellness, physical and mental health • Building a talent pipeline for specific roles through • Succession planning
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Partners, Vendors & Reinsurers	<ul style="list-style-type: none"> • One-on-one meetings • Annual reviews • Contracts, e-mails, calls, virtual interactions • Periodic surveys 	<ul style="list-style-type: none"> • Long-term partnerships • Favourable product and value proposition • Ease of doing business and data security • Payment as per terms of contract 	<ul style="list-style-type: none"> • Offer compelling value proposition to distribution partners • Innovative product propositions and market leading digital capabilities to cater to evolving customer needs • Timely payment for services • Digital services and well-defined information and cyber security policy
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<p>Communities</p>	<ul style="list-style-type: none"> • CSR partnerships and implementation of CSR related projects • CSR-related disclosures in public domain 	<ul style="list-style-type: none"> • Community development and growth • Employee volunteering 	<ul style="list-style-type: none"> • Adoption of sustainable business practices • Working with communities / weaker sections. • Employees volunteering opportunities • Sourcing policies for rural areas • Engaging with vendors employing less privileged and rural resources
<p>Regulators</p>	<ul style="list-style-type: none"> • Compliance with regulatory requirements, notifications, circulars and guidelines • Regular meetings, seminars and participation in industry forum • Periodic submissions, regulatory visits and interactions 	<ul style="list-style-type: none"> • Sound Corporate Governance - Fair dealings, conduct and transparency, timely disclosure. • Regulatory and legal Compliance. • Contribution towards development of industry. 	<ul style="list-style-type: none"> • Play a proactive role in creating awareness about need for insurance. • Comply with all the applicable regulations.

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V. Sustainable operations and Environment policy

The Company's goal is to incorporate environment responsibility in its business operations. The company aims to reduce adverse effects of the organisation on carbon emission, water, waste and energy. The company will adopt the following initiatives to save the environment:

1. **Responsible consumption of energy:** The Company will make efforts to minimize the carbon footprint throughout its business operations by optimizing and enhancing energy efficiency through energy efficiency devices, prioritizing renewable sources of energy over non-renewable energy, wherever feasible.

Our Corporate office is in Green rated building that optimizes the uses of Air conditioning and reduce the electric consumption. The corporate office building's fully high-efficient glass façade permits more natural light into the building during the day with fewer thermal gain, which reduces the need for air conditioning and artificial light fixtures. To save more energy, LED light fixtures are placed in corporate office as well as branches. The Corporate office has been designed with individual AC thermostat installation, to control AC parameters such as airflow, temperature control, for each enclosed area / cabin etc. As a direct result, workplace air conditioning consumption is optimized. We conduct Indoor air quality assessment on periodic basis for employee wellbeing.

2. **Water:** The Company makes efforts to ensure that water is utilized judiciously. At the corporate office building, an STP plant (sewage treatment plant) is installed, and recycled water is utilized in the washrooms. The company has selected water efficient fixtures and faucet.
3. **Waste Management:** The Company will strive to reduce and minimize all types of waste generation, including e-waste, hazardous and non-hazardous waste, by adopting 'reduce-reuse-recycle' philosophy.

The Company has the practice of disposing e-waste in accordance with the e-waste guidelines through certified vendors. Dry waste is disposed of in accordance with local municipal waste guidelines. The food waste in office cafeteria is minimized with conscious efforts and the waste is converted into compost. The company has minimized the use of single use plastic in its day-to-day operations.

4. **Increase digitalisation initiatives to reduce paper consumption:** The company embraced digitization and undertakes various initiatives to reduce paper consumption. The company conducts paperless Board meetings. The agenda of the meetings of the Board and Committees of the Board are circulated on an app

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and can be accessed by the Directors on their tablets. The company has put in place digital solutions along the entire customer and employee lifecycle journey.

5. **Environment awareness campaigns for employees:** The Company sensitizes employees to imbibe climate conscious decisions in all spheres of activity. Employees shall be made aware of initiatives being taken by the Company for sustainable and go-green goals, efforts to minimise Green House Gas (GHG) emissions, optimal water utilisation, reduce and reuse philosophy, minimal natural resource utilisation and waste reduction. The company will engage and encourage employees to adopt environment friendly practices through training and awareness programs.
6. **Carbon neutrality and Reporting:** The company aims to be carbon neutral by 2050. The company will set short, medium, and long-term targets to achieve this goal and reduce the Scope 1 and Scope 2 emissions. The targets and progress against the targets will be reported annually in the Business Responsibility and Sustainability Reporting.
7. **Procurement Practices:** The Company recognizes the need to work closely with suppliers to reduce waste, improve efficiency, reduce carbon footprint, and engage with them to understand their commitment towards human rights and labour practices. The Company will work towards greater integration of environmental and social considerations in our procurement practices. The Company will strive to procure products which are recycled, environment friendly, energy efficient and locally sourced. The Company will also set clear expectations with vendors and suppliers to abide by labour laws, human rights and regulations in their regions of business. They are expected to adhere to laws addressing child, forced or trafficked labour.
8. **Review by ESG Management Forum:** The ESG Management Forum shall review the initiatives undertaken by the organization twice a year to ensure they are in alignment with the environment policy. The Forum will also review the key metrics of Company's environment performance.